

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TOMMY BROWN, on his own behalf and on  
behalf of other similarly situated persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00680-DGE

STIPULATED MOTION AND  
[PROPOSED] ORDER TO  
CONTINUE DEADLINE TO FILE  
JOINT STATUS REPORT AND  
DISCOVERY PLAN AND  
CONTINUE SCHEDULING  
CONFERENCE

NOTE ON MOTION CALENDAR:

Wednesday, February 7, 2023

Pursuant to Western District of Washington Local Civil Rules 7(d)(1) and 10(g), and in a cooperative effort to comply with this Court's March 8, 2022 and January 10, 2023 directives to file a Joint Status Report, and after meeting and conferring, Plaintiff Tommy Brown ("Plaintiff") and Defendants Transworld Systems Inc. ("TSI"), Patenaude & Felix, APC ("P&F"), U.S. Bank National Association ("U.S. Bank"), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2

STIPULATED MOTION AND [PROPOSED] ORDER TO  
CONTINUE DEADLINE TO FILE JOINT STATUS REPORT  
AND HOLD SCHEDULING CONFERENCE (NO. 2:20-CV-  
00680-DGE) – 1

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(collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), respectfully submit this stipulated motion to continue the deadline to file the Joint State Report and to hold the Scheduling Conference. The parties propose the following continued deadline and conference date:

<b>Event</b>	<b>Deadline</b>
Joint Status Report and Discovery Plan	Thursday, February 16, 2023
Scheduling Conference	Thursday, February 23, 2023 at 9:30 am (virtual)

The parties have entered this stipulation to accommodate the limited availability of parties and counsel as a result of their preparation for oral argument in the Ninth Circuit appeal in the Osure Brown case, set for hearing on Friday, February 17, 2023, and to mutually cooperate in the management of this action and for the purpose of maximizing judicial economy and conserving the parties’ resources. The extension of the above deadlines does not alter or modify any other rights or responsibilities of the parties except as stated herein permitted by law or under the Federal Rules of Civil Procedure, or the Local Civil Rules.

DATED: February 7, 2023.

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Loan Trust 2004-2, National Collegiate  
Student Loan Trust 2005-1, National  
Collegiate Student Loan Trust 2005-2,  
National Collegiate Student Loan Trust 2005-  
3, National Collegiate Student Loan Trust  
2006-1, National Collegiate Student Loan  
Trust 2006-2, National Collegiate Student  
Loan Trust 2007-1, National Collegiate  
Student Loan Trust 2007-2*

**[PROPOSED] ORDER**

IT IS SO ORDERED:

Based on the parties' representations, the schedule for filing the Joint Status Report and Discovery Plan and hold the Scheduling Conference is as follows:

Event	Deadline
Joint Status Report and Discovery Plan	Thursday, February 16, 2023
Scheduling Conference	Thursday, February 23, 2023 at 9:30 am (virtual)

DATED this \_\_\_\_ the day of February, 2022.

\_\_\_\_\_  
Honorable David G. Estudillo  
United States District Judge